

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA GARRETT,
ROBERT NIXON, SAMANTHA NIXON,
DAVID BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN, ROGELIO
VARGAS, MARILYN DEWEY, PETER
ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee limited
liability company,

Defendants.

Case No. 2:23-cv-00630

**DECLARATION OF GREGORY W.
ALBERT IN SUPPORT OF
PLAINTIFFS' MOTION FOR
RECONSIDERATION**

My name is Gregory W. Albert. My Washington State Bar Association Number is 42573. I am over the age of eighteen years and make this declaration under penalty of perjury.

1. A true and correct copy of Plaintiffs' proposed Amended Complaint is attached to this declaration as **Exhibit 1**.
2. My associates and I have represented greater than 60 Reed Hein customers individually. Each of the customers were provided a "power-of-attorney" form substantially identical to the one attached as **Exhibit 2**.
3. Reed Hein gave Exhibit 2 to customer Abigail Mesmer. I represented Ms. Mesmer in *Mesmer v. Reed Hein and Associates*, American Arbitration Association Case No. 01-20-0014-1061. During my examination of the Reed Hein speaking agent in that arbitration, I asked whether all customers were given such forms and she testified that they were. I asked whether Reed Hein has signed copies of those forms in its files and she testified that it did.
4. Highlighted copies of the Final Arbitration Awards in Ray Andes and Pamela Andes v. Reed Hein & Associates, LLC, American Arbitration Association Case No. 01-20-0014-0799; Yolanda Jerido v. Reed Hein & Associates, LLC, American Arbitration Association Case No. 01-21-0004-1416; Douglas Reif v. Reed Hein & Associates, LLC, American Arbitration Association Case No. 01-21-0003-6820; and Debbie Herman and Michael Nelson v. Reed Hein & Associates, LLC, American Arbitration Association Case No. 01-21-0003-6669, are attached as **Exhibit 3**.

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2 DATED this 26th day of October, 2023.
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4 By: s/Gregory W. Albert

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